

06B-CC-0235

CHRISTIAN VIDEO MINISTRIES, INC.
P. O. Box 1466
San Antonio, Texas 78295-1466

Received & Inspected

JAN - 3 2012

FCC Mail Room

December 28, 2011

Office of Secretary
Federal Communications Commission
Attention: Disability Rights Office, Room 3-B431
445 12th St., SW
Washington, DC 20554

TO WHOM IT MAY CONCERN:

Received notice December 20, 2011 that the 'closed captioning' exemption for this non-profit organization had been reversed and in speaking to Mr. Sylvester Hollinsworth was given phone number (202) 418-2517 which I called 12/28/11 and left a message. However, upon Mr. Hollinsworth's admonition, am re-petitioning for the said exemption. Our financial circumstances have not changed and adding the expense of 'closed captioning' would add an impossible and unfair burden. Enclosed are year-end totals for contributions and cost of air time the past three years (2008, 2009, 2010 as 2011 totals are not complete but anticipate will be down on contributions due the financial state of the country.

Christian Video Ministries, Inc., was organized for the sole purpose of filming, editing and broadcasting the chalk-talk sermons of a Baptist preacher, Dr. Peter S. Ruckman of Pensacola, Florida. Dr. Ruckman illustrates his Sunday evening sermon from the Word of God in colored chalk, making for a most unusual and unique ministry. This organization has been filming Dr. Ruckman and airing his chalk-talk sermons for over twenty-five years. Given the benefit of the doubt, I have overseen ALL correspondence for this ministry and can say with certainty there may have been ONE letter over these years inquiring about 'closed captioning'. Dr. Ruckman is a very sound Bible teacher and preacher, and while we would like for everyone to see and hear these sermons, we know that the Gospel message is available in 'closed captioning' format for those who are really interested in God's Word. Additionally since this is a visual ministry, the very fact that the 'closed captioning' would distort the picture for the viewer is not a good idea.

Since the organization's inception, NO SOLICITATION has ever been made for money on the air. Personnel are ALL volunteers—no paid employees! We operate within a very tight budget. We have approximately 700 copies of the sermons in circulation. From the 'closed captioning' advertisements which have readily come to us since the ruling, it's easy to calculate the cost of 'captioning' to us would be in the neighborhood of four hundred fifty thousand dollars (\$450,000), totally out of the question for us financially.

It is interesting to note that few viewers would benefit from the 'closed captioning'; however, these companies now soliciting our business would benefit greatly. We protest as we have a right to put out

the Gospel without such harassment. There should be some semblance of reality considered and we ask that this be done. We've had faithful viewers over the years who've helped this ministry with their 'unsolicited' gifts, and they would be sorely disappointed should the program not be able to air due to the 'greed' of others. Please let common sense be the 'rule' here and not 'closed captioning'!

Thank you very much for your just consideration. Please notify us if we should make other response.

Sincerely,

A handwritten signature in cursive script, appearing to read "Janora Dunson". The signature is written in dark ink and is positioned above the typed name.

Mrs. Jerry Dunson, Sec

CHRISTIAN VIDEO MINISTRIES, INC.

Enclosures: Affidavit, Financials Trials Balances, Sermon Titles, Advertisements for 'closed captioning', pricing noted

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FCC Mail Room

AFFIDAVIT

STATE OF TEXAS §

COUNTY OF PARKER §

BEFORE ME, the undersigned authority, on this day personally appeared MRS, JERRY DUNSON (also known as JANORA DUNSON) the duly authorized Secretary of CHRISTIAN VIDEO MINISTRIES, INC., known to me to be the person who subscribed her name below and who, after having first been duly sworn by me, on oath deposes and says:

"After recently receiving material concerning the "closed captioning ruling" from Federal Communications Commission, I called and spoke to Mr. Sylvester Hollingsworth with the FCC who told me to call (202) 418-2517, which I did and left a message. He instructed me also to re-petition the FCC to get a continuation of our exemption because of the "undue burden from the closed captioning rules"! A copy of our exemption is attached. I'm grateful for the notice because our organization was unaware of it. We did not detail our request for exemption because it seemed sufficient to state that it would bring to bear a substantial financial hardship on this non-profit organization. However, since such a stipulation would indeed be a financial burden too great for this organization, other documentation is enclosed for your serious consideration.

Christian Video Ministries, Inc. was organized for the sole purpose of filming, editing and broadcasting the chalk-talk sermons of a Baptist preacher, Dr. Peter S. Ruckman of Pensacola, Florida. Dr. Ruckman illustrates his Sunday evening sermon from the Word of God in colored chalk, making for a most unusual and unique visual ministry. The saying, "A picture

is worth a thousand words", suggests an alternative for the "closed captioning". This organization has been filming Dr. Ruckman and airing his chalk-talk sermons for over twenty-five years. Given the benefit of the doubt, I have overseen all correspondence for this TV ministry and can say with assurance, we may have received one letter over these many years inquiring about "closed captioned". Dr. Ruckman is a very sound Bible teacher and preacher, and while we would like for every one to see and hear these sermons, we know that the Gospel message is available in "closed captioning" format for those who are really interested in God's Word. Additionally since this is a visual ministry, the very fact that the "closed captioning" would distort the picture for the viewer is not a good idea.

Since the organization's inception, NO SOLICITATION has ever been made for money on the air. Finding sponsors who would pay for the cost of "closed captioning" is an unacceptable idea to the principals of our organization. We have at present 700 edited tapes in two different formats that would require "closed captioning". The tapes are approximately one hour in length. From the "closed captioning" advertisements which have come to us since the FCC "ruling", it is plain to calculate the cost to us would be upwards of Four Hundred Twenty Thousand Dollars (\$420,000.00), and this would not include freight to and from the company. Enclosed are financial statements for this organization for the last three (3) years, plainly indicating the fact that we do not have the finances to cover such costs. Please note this organization has no paid employees. All are volunteers!

It is interesting to note that few viewers would benefit from the "closed captioned", however, these companies now soliciting our business would benefit greatly. We protest as we have a right to put out the Gospel message without such harassment. There should be some

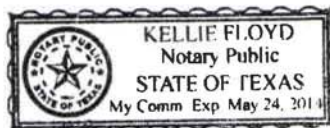
semblance of reality considered and we ask that this be done. We have had faithful viewers over the years that have helped this ministry by their "unsolicited" gifts, and they would be sorely disappointed should the program not be able to be aired due to the greed of other. Please let common sense be the "rule" here and not "closed captioning"!"

Further Affiant saith naught.

CHRISTIAN VIDEO MINISTRIES, INC.
AFFLIANT

By *Janora Dunson*
JANORA DUNSON, Secretary

SUBSCRIBED AND SWORN TO by the said JANORA DUNSON, Secretary of CHRISTIAN VIDEO MINISTRIES, INC., a Texas non-profit corporation, on behalf of said non-profit corporation, this 29th day of December 2011, to certify which witness my hand and seal of office.



Kellie Floyd
Notary Public in and for
Parker County, Texas
Kellie Floyd
Printed Name of Notary
My Commission Expires: May 24, 2014

Christian Video Ministries

Trial Balance

December 31, 2008

100	CASH	\$39,294.96	
110	PETTY CASH	\$100.00	
147	EQUIPMENT	\$399,659.38	
160	ACCUMULATED DEPRECIATION		\$397,436.68
280	CURRENT UNRESTRICTED FUND		\$89,030.73
305	CASH CONTRIBUTIONS		\$181,444.17
305	NON-CASH CONTRIB UTIONS		\$0.00
501	TAPE PURCHASE EXPENSE	\$0.00	
502	REPAIRS-EQUIPMENT	\$1,822.31	
503	OFFICE SUPPLIES	\$0.00	
504	FEES	\$5,951.49	
505	FREIGHT	\$0.00	
506	BANK CHARGE	\$0.00	
507	INSURANCE	\$0.00	
508	POSTAGE	\$441.25	
509	TELECASTING	\$219,598.75	
511	LITERATURE	\$1,003.44	
516	V IDEO SUPPLIES	\$0.00	
549	MISCELLANEOUS EXPENSE	\$40.00	
	SPECIAL MISSIONS ACCT	\$0.00	
		\$667,911.58	\$667,911.58

Christian Video Ministries

Trial Balance

December 31, 2009

100	CASH	\$5,758.37	
110	PETTY CASH	\$100.00	
147	EQUIPMENT	\$399,659.38	
160	ACCUMULATED DEPRECIATION		\$397,436.68
280	CURRENT UNRESTRICTED FUND		\$41,617.66
305	CASH CONTRIBUTIONS		\$190,268.00
305	NON-CASH CONTRIB UTIONS		\$0.00
501	TAPE PURCHASE EXPENSE	\$1,158.79	
502	REPAIRS-EQUIPMENT	\$1,348.31	
503	OFFICE SUPPLIES	\$22.01	
504	FEES	\$2,950.00	
505	FREIGHT	\$123.67	
506	BANK CHARGE	\$22.50	
507	INSURANCE	\$0.00	
508	POSTAGE	\$333.25	
509	TELECASTING	\$217,617.00	
511	LITERATURE	\$187.06	
516	V IDEO SUPPLIES	\$0.00	
549	MISCELLANEOUS EXPENSE	\$42.00	
	SPECIAL MISSIONS ACCT	\$0.00	
		\$629,322.34	\$629,322.34

Christian Video Ministries

Trial Balance

December 31,2010

100	CASH	\$3,017.42	
110	PETTY CASH	\$100.00	
147	EQUIPMENT	\$405,253.58	
160	ACCUMULATED DEPRECIATION		\$397,436.68
280	CURRENT UNRESTRICTED FUND		\$8,081.07
305	CASH CONTRIBUTIONS		\$192,343.09
305	NON-CASH CONTRIB UTIONS		\$0.00
501	TAPE PURCHASE EXPENSE	\$0.00	
502	REPAIRS-EQUIPMENT	\$1,081.71	
503	OFFICE SUPPLIES	\$0.00	
504	FEES	\$1,800.00	
505	FREIGHT	\$827.55	
506	BANK CHARGE	\$54.40	
507	INSURANCE	\$0.00	
508	POSTAGE	\$459.84	
509	TELECASTING	\$183,359.00	
511	LITERATURE	\$1,863.34	
516	V IDEO SUPPLIES	\$0.00	
549	MISCELLANEOUS EXPENSE	\$44.00	
	SPECIAL MISSIONS ACCT	\$0.00	
		\$597,860.84	\$597,860.84

SERMON TITLES (tape length 1 hour)

A FRESH START
A LETTER FROM HELL
A LOOK IN THE FURNACE
BODY, SOUL, AND SPIRIT
FOUR JUDGMENTS
GREAT WHITE THRONE JUDGMENT
THE JUDGMENT SEAT OF CHRIST
SEVEN BAPTISMS
SEVEN SEVENS
THE FATHERHOOD OF GOD
THE HOLY SPIRIT
KINGDOM OF GOD VS KINGDOM OF HEAVEN
SEVEN MYSTERIES
THE TEMPTATIONS OF CHRIST
TWO KINDS OF REPENTANCE
WHAT A CHRISTIAN CAN LOSE
WHERE THE DEAD GO
THE TABERNACLE
THE GREAT MURDER MYSTERY
ROMANS 8:28
TEARS OF THE BIBLE
TROUBLE AND THE CHRISTIAN
WHEN GOD REMEMBERS
WHY DO THE RIGHTEOUS SUFFER
WHY GO ON LIVING
ROOM WITH A VIEW/THREE REASONS MEN REJECT CHRIST
FIVE SURPRISES IN HELL
FOUR ESSENTIALS
GOD'S DESCRIPTION OF THE LOST
HATED WITHOUT A CAUSER
HOW YOU CAN KNOW YOU ARE SAVED
JESUS' DONKEY
LESSONS LEARNED AT CALVARY
PAST, PRESENT AND FUTURE
SIN AS A SERPENT
THE GOSPEL
THE GREAT JURY TRIAL
THE HEAVIEST BURDEN
THE HOPELESS WOMAN
THE MIDDLEMAN
THE MOST IMPORTANT STEP
THE ONLY MAN WHO UNDERSTOOD THE CRUCIFIXION
THE DEATH ANGEL
THE TERRIBLE TEXT

WATCH WORDS OF THE BIBLE
THE GODPEL ACCORDING TO I KINGS
THE GOSPEL PUNCHBOARD
WHAT IS YOUR LIFE?
WHY SIT YE HERE TIL YE DIE?
ROTTEN WOMAN
ASHAMED OF JESUS
CHRISTIAN DISCIPLINE
DESERTION AND DISCHARGE
GOD'S SECOND BEST
GOD'S WOMAN
THE GREATEST THING YOU CAN DO
HOW TO HAVE A SUCCESSFUL NERVOUS BREAKDOWN
LESSONS FROM THE LIFE OF LOT
LOOKING BACK
MIRROR, MIRROR
OLD SOLDIERS NEVER DIE
PARTING OF THE WAYS
SHE HATH DONE WHAT SHE COULD
THE BABY
THE BOTTLE
THE DEAD CHRISTIAN
THE END OF THE ROPE
THE LAUGHTER OF GOD
THE VACANT CHAIR
WHY MEN DON'T READ THE BIBLE
SEPULCHRE IN THE GARDEN
THE WHOLE ARMOR OF GOD
COME BEFORE WINTER
DEAD MEN, MAD MEN AND PIGS
PEOPLE WHO WON'T LIKE HEAVEN
THE GREATEST LOVE STORY
THE FOUR HUNDRED
SINS OF THE SAINTS
SEVEN STEPS TO FAILURE
THE WASTED LIFE
THE MAN IN THE MESS
THE 64,000 DOLLAR QUESTION
SITTING AND WATCHGIN
LOOK AND LIVE
THE MAN WHO BECAME AN ANIMAL
THE MOST PRECIOUS THING
COMFORTS OF DEATH
THE GOSPEL ACCORDING TO DANIEL
FOUR PARTS OF THE CHRISTIAN LIFE
THE BLIND MARRIAGE
HEAVEN & HELL
BEHOLD THE MAN

SUPERMAN
SAFE FOREVER
WHY CAME WE OUT OF EGYPT
CAPITAL AND LABOR
SPIRITUAL SACRIFICES
WAR ON THE FLESH
NOT NOW BUT AFTERWARDS
DISCOURAGEMENT
THE MOTHERHOOD OF GOD
THE MAN WHO LOST EVERYTHING
MEETING GOD IN A DARK PLACE
THE PRODIGAL SON
HINDRANCES TO PRAYER
HOW TO HAVE PEACE OF MIND
THE GREAT WOMAN OF SHUNEM
THE GAME OF LIFE
THE WORD AS A LAMP
REAL PRAYER
WHAT TO DO WITH THE BIBLE/LAST MINUTE INSTRUCTIONS
HYPOCRITES IN THE CHURCH
CUP OF DEVILS/THE GIANT IN YOUR LIFE
THE POTTER'S HOUSE
ABOVE THE CLOUDS
THE BOY WHO HELPED JESUS
THE BACKSLIDER IN HEART
THE WEEPING PROPHET
CHRISTIAN OLMPICS



Caption Labs

1010 Taylor Station Road, Suite E, Columbus, OH 43230
877-258-7800 • www.CaptionLabs.com

IMPORTANT CLOSED CAPTIONING INFORMATION

November 2, 2011

Dear Media Director,

The FCC's recent decision to overturn your closed captioning exemption certainly creates new factors to consider. Production costs and air time purchases are already difficult mountains to climb. Now, you're facing another giant peak in figuring out what to do about closed captioning.

By losing the exemption from the FCC, there are many financial hurdles to consider. **Purchasing captioning software and encoding equipment alone can be insurmountable.** Of course, you'll also have to spend time figuring out the captioning process itself as well as FCC regulations. Then, *creating the captions will eat up your time and constantly push you up against tight deadlines.* Wrestling with these costs and issues will leave you feeling like your only option is to go off the air.

As a producer of religious television content myself, *I have firsthand experience dealing with the financial burden and questions facing you right now.* I also understand and believe in the purpose and significance of your television program. That's why I want to help you move forward.

The FCC's decision can be intimidating, **but my company can help you eliminate that stress.** We've helped many producers save weeks of production time and thousands of dollars with our unique **eCaptioning process.** Simply put, **I know that we can save you time and money.** Plus, we do all the extra work to keep you compliant with the FCC.

I'd love to discuss how my company can help you. We are committed to finding the most cost-effective solution for you. In fact, **I will personally give you a special ministry discount.** Simply mention this letter when you call and you'll receive discounted pricing as low as \$167 per half-hour program! Be sure to contact me soon, because I can only extend this offer to a limited number of clients.

\$1 = 334
Per 1 hr.

Providing captions can be very beneficial to the mission of your organization. I believe this is truly a great opportunity for us to help you **strengthen the message of your ministry.** Millions of Americans are hard of hearing. Closed captioning will make your program more accessible to both the deaf and elderly communities and is **available to you at a fraction of the cost** of air time and other production expenses.

Remember to mention the special ministry discount when you call. I look forward to talking to you soon!

Sincerely,

Adam R. Grover

Caption Labs

Phone: 877-258-7800 ext. 104

Email: agrover@captionlabs.com

P.S. Please don't hesitate to contact me. The **special ministry discount of \$167** can only be offered to a limited number of clients, so call and lock in the special pricing today.

FCC
requires captioning

ClosedCaption Maker

SERVICE-DISABLED VETERAN-OWNED SMALL BUSINESS

1955 Kensington Street • Harrisburg PA 17104

wGallant@CCmaker.com • www.CCmaker.com • 1-800-527-0551

FCC Closed-Captioning Exemption Rule Changed

You have options:

1. The least expensive way is to supply the TV station a CCed DVD.
We create a 'caption file' you add to the DVD; Apple DVD StudioPro/Encore.
Cost is \$100/per half-hour weekly program. *1 hr = 200 per hr.*
2. We sell a turnkey closed-captioning system; cost is \$1600.
Designed to be easy to use and creates a CCed BetaSP tape.
30-day money back guarantee. System is called AddRollupCC.
3. You can send us a DV/BetaSP tape, we create a CCed BetaSp
and forward it to the TV station. Cost is \$150/per program. *x2 = 1 hr \$300*